

U.S. Department of Justice
Washington, DC 20530

OMB No. 1124-0002; Expires July 31, 2023

Supplemental Statement

Pursuant to the Foreign Agents Registration Act of 1938, as amended

For 6 Month Period Ending 01/31/2021
(Insert date)

I - REGISTRANT

1. (a) Name of Registrant (b) Registration Number
- Ott, Bielitzki & O'Neill PLLC 6573
- (c) Primary Business Address
1629 K St NW, Suite 300
Washington, DC 20006

2. Has there been a change in the information previously furnished in connection with the following?

- (a) If an individual:
- | | | |
|---------------------------|------------------------------|-----------------------------|
| (1) Residence address(es) | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (2) Citizenship | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (3) Occupation | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
- (b) If an organization:
- | | | |
|--------------------------|------------------------------|--|
| (1) Name | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (2) Ownership or control | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (3) Branch offices | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

(c) Explain fully all changes, if any, indicated in Items (a) and (b) above.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSES TO ITEMS 3, 4, 5, AND 6.

3. If the registrant previously filed an Exhibit C¹, state whether any changes therein have occurred during this 6 month reporting period. Yes ☐ No ☒
- If yes, has the registrant filed an updated Exhibit C? Yes ☐ No ☐
- If no, please file the updated Exhibit C.

¹ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530.)

4. (a) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
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(b) Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Name	Position	Date Ceased
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5. (a) Has any person named in Item 4(a) rendered services directly in furtherance of the interests of any foreign principal?

Yes ☐ No ☐

If yes, identify each such person and describe the service rendered.

Name	Foreign Principal(s) Represented	Services
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(b) During this 6 month reporting period, has the registrant hired as employees or in any other capacity, any persons who rendered or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

Name	Residence Address	Citizenship	Position	Date Assumed
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(c) Have any employees or individuals, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or Connection	Date Terminated
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(d) Have any employees or individuals, who have filed a short form registration statement, terminated their connection with any foreign principal during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or Connection	Foreign Principal	Date Terminated
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6. Have short form registration statements been previously filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement or submitted with this filing? Yes ☐ No ☐

If no, list names of persons who have not previously filed the required statement or are not submitting a short form with this filing.

II - FOREIGN PRINCIPAL

7. Has the registrant's connection with any foreign principal(s) ended during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal

Date of Termination

8. Has the registrant added any new foreign principal(s)² during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal

Date Added

9. In addition to those named in Items 7 and 8, if any, list the foreign principal(s) whom the registrant continued to represent during the 6 month reporting period.

Barzan Aeronautical LLC

10. (a) Has the registrant filed Exhibits A and B for the newly added foreign principal(s), if any, listed in Item 8?

Exhibit A³ Yes ☐ No ☐ N/A ☒

Exhibit B⁴ Yes ☐ No ☐ N/A ☒

If no, please file the required exhibit.

(b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal(s) whom the registrant represented during this 6 month period? Yes ☐ No ☒

If yes, has the registrant filed an amendment to these exhibits? Yes ☐ No ☐

If no, please file the required amendment.

² The term "foreign principal" includes, in addition to those defined in Section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a) (9)). A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

³ The Exhibit A, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal.

⁴ The Exhibit B, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

III - ACTIVITIES

11. During this 6 month reporting period, has the registrant engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☒ No ☐

If yes, identify each foreign principal and describe in full detail all activities and services:

Foreign Principal

Barzan Aeronautical LLC

Ott, Bielitzki & O'Neill PLLC provided legal and government relations counsel to the Client on its U.S. and international commercial business, and represented the Client on U.S. regulatory, compliance and export control matters.

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Activities/Services

The Firm's legal work included negotiating and drafting U.S. and international commercial legal agreements, providing legal counsel to the Client in negotiations with third parties, reviewing legal agreements received from third parties, providing counsel and representation on regulatory matters involving the Client's business operations, export control and compliance matters, and communication with relevant U.S. officials as required. The Firm retained subject matter experts as needed. The Firm also worked with local colleges and universities regarding student exchange and job training programs.

12. During this 6 month reporting period, has the registrant, on behalf of any foreign principal, engaged in political activity⁵ as defined below? Yes ☒ No ☐

If yes, identify each foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures, social media, internet postings, or media broadcasts, give details as to dates, places of delivery, names of speakers and subject matter. The response must include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation and dissemination of informational materials.

Set forth below a general description of the registrant's political activities.

The firm worked with local colleges and universities regarding student COVID-19 relief.

Set forth below in the required detail the registrant's political activities.

Foreign Principal	Date	Contact	Method	Purpose
See Attachment A				

13. In addition to the above described activities, if any, has the registrant engaged in activity or rendered any services on its own behalf which benefits the registrant's foreign principal(s)? Yes ☐ No ☒

If yes, describe fully.

Foreign Principal**Activities/Services**

⁵ "Political activity," as defined in Section 1(o) of the Act, means any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV - FINANCIAL INFORMATION**14. (a) RECEIPTS-MONIES**

During this 6 month reporting period, has the registrant received from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If no, please explain why no monies were received.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.⁶

Foreign Principal	Date Received	From Whom	Purpose	Amount	Subtotal
Barzan Aeronautical LLC - see Attachment B					

Total

(b) RECEIPTS - FUNDRAISING CAMPAIGN

During this 6 month reporting period, has the registrant received, as part of a fundraising campaign⁷, any money on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☐ No ☒

If yes, has the registrant previously filed an Exhibit D⁸ to its registration? Yes ☐ No ☐

If yes, indicate the date the Exhibit D was filed. Date _____

If no, please file the required Exhibit D.

(c) RECEIPTS-THINGS OF VALUE

During this 6 month reporting period, has the registrant received any thing of value⁹ other than money from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal? Yes ☒ No ☐

If yes, furnish the following information:

Foreign Principal	Date Received	From Whom	Purpose	Thing of Value
See attachment C				

^{6, 7} A registrant is required to file an Exhibit D if he/she collects or receives contributions, loans, moneys, or other things of value for a foreign principal, as part of a fundraising campaign. (See Rule 201(e)).

⁸ An Exhibit D, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal.

⁹ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS-MONIES

During this 6 month reporting period, has the registrant disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement or transmitted monies to any such foreign principal? Yes ☒ No ☐

If no, explain why no disbursements were made.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Foreign Principal	Date	Recipient	Purpose	Amount	Subtotal
Barzan Aeronautical					
- See Attachment D					

Total

(PAGE 7)

(b) **DISBURSEMENTS-THINGS OF VALUE**

During this 6 month reporting period, has the registrant disposed of anything of value¹⁰ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in Items 7, 8, or 9 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal	Date	Recipient	Purpose	Thing of Value
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(c) **DISBURSEMENTS-POLITICAL CONTRIBUTIONS**

During this 6 month reporting period, has the registrant (or any short form registrant) from its own funds and on its own behalf either directly or through any other person, made any contributions of money or other things of value¹¹ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☐ No ☐

If yes, furnish the following information:

Date	Donor	Political Organization/Candidate	Method	Amount/Thing of Value
02.10.2020	Christopher Ott	Tim Scott for Senate	Credit Card	\$250.00 USD
17.10.2020	Christopher Ott	Team Graham Inc	Credit Card	\$250.00 USD

^{10, 11} Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

V - INFORMATIONAL MATERIALS

16. (a) During this 6 month reporting period, has the registrant prepared, disseminated or caused to be disseminated any informational materials?¹² Yes ☐ No ☒

(b) If yes, identify each such foreign principal for which informational materials were disseminated and respond to the remaining items in this section.

17. During this 6 month reporting period, has a budget been established or specified sum of money allocated to finance the registrant's activities in preparing or disseminating informational materials? Yes ☐ No ☒

If yes, identify each such foreign principal, and specify the period of time and the amount.

Foreign Principal	Period of Time	Amount
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18. During this 6 month reporting period, has the registrant's activities in preparing, disseminating or causing the dissemination of informational materials included the use of any of the following:

- | | | | |
|--|---|---|--|
| <input type="checkbox"/> Magazine or newspaper | <input type="checkbox"/> Advertising campaigns | <input type="checkbox"/> Press releases | <input type="checkbox"/> Pamphlets or other publications |
| <input type="checkbox"/> Lectures or speeches | <input type="checkbox"/> Radio or TV broadcasts | <input type="checkbox"/> Motion picture films | <input type="checkbox"/> Letters or telegrams |
| <input type="checkbox"/> Email | | | |
| <input type="checkbox"/> Website URL(s): _____ | | | |
| <input type="checkbox"/> Social media websites URL(s): _____ | | | |
| <input type="checkbox"/> Other (specify) _____ | | | |

19. During this 6 month reporting period, has the registrant prepared, disseminated, or caused to be disseminated informational materials among any of the following groups:

- | | | |
|--|---|---|
| <input type="checkbox"/> Public officials | <input type="checkbox"/> Newspapers | <input type="checkbox"/> Libraries |
| <input type="checkbox"/> Legislators | <input type="checkbox"/> Editors | <input type="checkbox"/> Educational institutions |
| <input type="checkbox"/> Government agencies | <input type="checkbox"/> Civic groups or associations | <input type="checkbox"/> Nationality groups |
| <input type="checkbox"/> Other (specify) _____ | | |

20. Indicate the language used in the informational materials:

- | | |
|----------------------------------|--|
| <input type="checkbox"/> English | <input type="checkbox"/> Other (specify) _____ |
|----------------------------------|--|

21. Has the registrant filed with the FARA Unit, U.S. Department of Justice a copy of each item of such informational materials prepared, disseminated or caused to be disseminated during this 6 month reporting period? Yes ☐ No ☐

If no, please file the required informational materials.

22. Has the registrant labeled each item of such informational materials with the statement required by Section 4(b) of the Act?

Yes ☐ No ☐

¹² The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

VI - EXECUTION

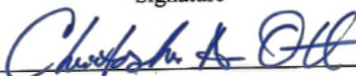
In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date

Printed Name

Signature¹³

02/24/2021 Christopher A. Ott



¹³ This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

Attachment A - Reportable Contacts

Date	Type	Agency / Office	Name(s)	Description
August 10, 2020	Emails	Charleston County Aviation Authority	Elliott Summey	Schedule development update re: Barzan Aero
August 13, 2020	Emails	Trident Technical College	Elizabeth Colbert Busch/Jennifer Lockhart	SCATC opening & Barzan Aero
August 18, 2020	Call	Charleston County Aviation Authority	Elliott Summey	Meeting request Re: Barzan Aero development
August 21, 2020	Call	Charleston County Economic Development	Steve Dykes	Barzan Aero development update
August 21, 2020	Emails	Charleston County Economic Development	Steve Dykes	Barzan Aero development update
August 31, 2020	Call	Trident Technical College	Elizabeth Colbert Busch	Barzan Aero development update & Center of Excellence
September 14, 2020	Calls/Emails	Charleston County Aviation Authority	Elliott Summey/Hernan Peña	Discuss schedule and logistics for Qatari MOD visit
September 14, 2020	Emails	Charleston County Economic Development	Steve Dykes/Daniel Royal	Schedule meeting with Electra CEO
September 17, 2020	Call	City of Charleston	Rick Jerue	Meeting Request - Mayor Tecklenburg and Qatari MOD
September 17, 2020	Email	City of Charleston	Rick Jerue	Meeting Request - Mayor Tecklenburg and Qatari MOD
September 17, 2020	Calls/Emails	Charleston County Aviation Authority	Elliott Summey	Schedule meetings for Qatari MOD visit
September 17, 2020	Calls/Emails	Charleston County Economic Development	Steve Dykes	Schedule meetings for Qatari MOD visit
October 1, 2020	Email	Charleston County Aviation Authority	Elliott Summey	Barzan Aero development update
October 28, 2020	Email	Charleston County Aviation Authority	Hernan Pena	Questions regarding Lease and Operations
December 7, 2020	Email	Charleston County Economic Development	Steve Dykes	Sent information regarding Electra
December 7, 2020	Email	Trident Technical College	Elizabeth Colbert Busch	Sent information regarding Electra
December 8, 2020	Email	Charleston County Economic Development	Steve Dykes	Schedule update call re: Barzan Aero
December 11, 2020	Call	Charleston County Economic Development	Steve Dykes	Barzan Aero development update
January 11, 2021	Emails	Trident Technical College	Elizabeth Colbert Busch	Notice by TTC of Barzan Aero mention in school publication
January 13, 2021	Emails	Charleston County Economic Development	Janel Spencer	Schedule update call re: Barzan Aero
January 15, 2021	Zoom	Charleston County Economic Development	Steve Dykes	Update call re: Barzan Aero
January 15, 2021	Emails	Charleston County Economic Development	Jennifer Brown	Follow-up from Zoom Meeting
January 19, 2021	Emails	Trident Technical College	Elizabeth Colbert Busch	Schedule virtual introductory meeting with Barzan Aero management and Dr. Mary Thornley
January 21, 2021	Zoom	Trident Technical College	Elizabeth Colbert Busch	Virtual Meeting with Barzan Aero Management & Dr. Mary Thornley
Reporting Period	Calls	U.S. Defense Attache, Doha	Col. Kessey	Calls regarding Defense Procurement

Attachment B - Monies Received

The law firm fees and expenses received (and 100% disclosed herein) represent remuneration from the Client for both FARA and NON-FARA work. Payments received for NON-FARA work include fees and expenses paid to third party consultants/experts retained by the firm on matters involving U.S. and international commercial legal work/contract negotiation and preparation, administrative/regulatory proceedings on the record, retention of international tax counsel for Client's commercial business, subject matter experts in aviation and related technical/industry experts.

NO FUNDS WERE DISPERSED FOR (OR TO) ANY GOVERNMENT OFFICIAL OR MEDIA ORGANIZATION, OR MEMBERS THEREOF.

Principal	Date	Purpose	Amount
Barzan Aeronautical LLC	07/27/2020	Payment for law firm fees and expenses, and for payments to third party legal, tax and subject matter experts/consultants for commercial/NON-FARA covered matters.	\$360,000.00
Barzan Aeronautical LLC	08/26/2020	Payment for law firm fees and expenses, and for payments to third party legal, tax and subject matter experts/consultants for commercial/NON-FARA covered matters.	\$548,890.00
Barzan Aeronautical LLC	09/25/2020	Payment for law firm fees and expenses, and for payments to third party legal, tax and subject matter experts/consultants for commercial/NON-FARA covered matters.	\$469,780.00
Barzan Aeronautical LLC	10/27/2020	Payment for law firm fees and expenses, and for payments to third party legal, tax and subject matter experts/consultants for commercial/NON-FARA covered matters.	\$460,500.00
Barzan Aeronautical LLC	11/25/2020	Payment for law firm fees and expenses, and for payments to third party legal, tax and subject matter experts/consultants for commercial/NON-FARA covered matters.	\$464,500.00
Barzan Aeronautical LLC	12/14/2020	Payment for law firm fees and expenses, and for payments to third party legal, tax and subject matter experts/consultants for commercial/NON-FARA covered matters.	\$500,000.00
Barzan Aeronautical LLC	01/14/2021	Payment for law firm fees and expenses, and for payments to third party legal, tax and subject matter experts/consultants for commercial/NON-FARA covered matters.	\$500,000.00
Barzan Aeronautical LLC	01/19/2021	Payment for law firm fees and expenses, and for payments to third party legal, tax and subject matter experts/consultants for commercial/NON-FARA covered matters.	\$83,417.00

Principal	Date	Purpose	Amount
Barzan Aeronautical LLC	12/31/2020	Funds held in Client Escrow Account pending payment authorization by Client.	\$500,000.00

Attachment C - Receipts Things of value

Date	Description
December 14, 2020	Airline ticket and travel expenses for consultants on commercial business.
December 9, 2020	Airline ticket and travel expenses for consultants on commercial business.

Attachment D - Disbursements Monies

The law firm dispersed the following funds to third party consultants/legal/tax and subject matter experts for NON-FARA related work, including U.S. and international commercial legal work/contract negotiation and preparation, administrative/regulatory proceedings on the record, retention of international tax counsel for Client's commercial business, subject matter experts in aviation and related technical/industry experts.

NO funds were dispersed for (or to) any government official or media organization, or members thereof.

Date	Description	Amount
08/20	Third-Party Legal / Consultants / Subject Matter Experts	238,164.49 \$
09/20	Third-Party Legal / Consultants / Subject Matter Experts	319,847.77 \$
10/20	Third-Party Legal / Consultants / Subject Matter Experts	116,133.87 \$
11/20	Third-Party Legal / Consultants / Subject Matter Experts	105,975.05 \$
12/20	Third-Party Legal / Consultants / Subject Matter Experts	137,330.47 \$
01/21	Third-Party Legal / Consultants / Subject Matter Experts	173,830.91 \$